

### **REMARKS**

Applicant has carefully considered the Office action (“Action”) and the references of record. Claims 1-54 are pending. Claims 1-54 were amended. No claims are canceled or withdrawn. Accordingly, claims 1-54 remain pending.

Withdrawal of the outstanding rejections is respectfully requested in view of the following remarks.

#### **Request for Information**

The Office Action (“Action”) requests a copy of “Reinforcement Clustering of Multi-Type Interrelated Data Objects”. “Reinforcement Clustering of Multi-Type Interrelated Data Objects” is already part of the detailed description of the specification as filed. Please refer to the Appendix beginning on page 24 to find: Appendix A: “Reinforcement Clustering of Multi-Type Interrelated Data Objects”.

The Action also request a copy of “CBC: Clustering Based Text Classification Requiring Minimal Labeled Data”, by Hua-Jun Zeng et al., November 19-22, 2003, ICDM-03 (2003 IEEE International Conference on Data Mining), Melbourne, Florida. A copy of this reference is included in an information disclosure statement submitted with this response.

#### **Drawing Objections**

Replacement drawings in compliance with 37 CFR 1.121(d) for Figs. 1 and 3 are submitted with this response. Fig. 1 has been amended to change “Structured Solution Objects” of component 110 and “SSO” of component 114

respectively to "Structured Answer Objects" and "SAO". For consistency, Fig. 3 has also been amended as suggested by the Action to replace "Structured Solution Objects" with "Structured Answer Objects". Such Structured Answer Objects (SAOs) are described in the specification as filed, for example, at paragraph [0025].

Withdrawal to the objection to the drawings is respectfully requested.

### **Specification Objections**

Applicant has changed the title of the invention to "Processing Service Requests for Product Support with Indexed and Clustered Answer Objects" as suggested by the Action. Portions of the specification which recited the previous title are also replaced with this new title.

As requested by the Action, Applicant confirms that the Appendix A, which is positioned between the conclusion portion of the specification and before the claims portion of the specification, is part of the specification.

As indicated above in the section titled "Requirement for Information", "Reinforcement Clustering of Multi-Type Interrelated Data Objects" is described in Appendix A, starting on page 24 of the specification. A copy of "CBC: Clustering Based Text Classification Requiring Minimal Labeled Data", by Hua-Jun Zeng et al., November 19-22, 2003, ICDM-03 (2003 IEEE International Conference on Data Mining), Melbourne, Florida, is cited in an IDS submitted herewith.

Withdrawal of the objections to the specification is respectfully requested.

### **Claim Objections**

In addressing **claims 1, 15, 31 and 45**, the Action indicates that the feature "each structured solution data object lacks antecedent basis in the claims. Applicant has amended these claims to change "structured solution data object" to "structured answer data object". This amendment is fully supported in the specification, for example, at paragraph [0025].

Additionally, addressing claims 1, 15, 31, and 45; the Action indicates that it is not clear which "set" is being referred to in the phrase "from the set to the end user". The Examiner suggests changing the phrase to "the set of one or more structured answer data objects". Although this change would not substantially alter the scope of the claims, "the one or more structured answer data objects" is already being used consistently throughout the claims. For instance, "the one or more structured answer data objects" has antecedent basis in "converting, by a computing device, unstructured service requests to one or more structured answer objects". Additionally, "a set" is defined as follows "a set of **the one or more structured answer data objects**" (emphasis added). Thus, the phrase "the set" has proper antecedent basis in "a set", and lack of clarity does not arise because the claims recite the phrase for the first time using "the set". Similarly, two different sets are not recited in the same claims, thus uncertainty should not exist as to which of two sets was intended. Consequently, Applicant respectfully submits that a person of ordinary skill could reasonably ascertain that "[t]he set" is based on and yet distinct from "the one or more structured answer objects", "the set" being based on "term(s) and/or phrase(s) related to the product problem description".

Withdrawal of the objections to claims 1, 15, 31 and 45 is respectfully requested.

In addressing **claims 4, 18, 34 and 48** the Action indicates that the term "providing" is interpreted to refer to "the step of providing" as recited in claim 1. Applicant agrees with this clear interpretation of the term. Even in view of this correct interpretation, claims 4, 18, 34 and 48 have been amended to more particularly point out that the term "providing" has appropriate antecedent basis in their respective base claims (i.e., "providing the historic and hierarchically structured problem diagnosis data").

Additionally, in addressing claims 4, 18, 34 and 48, the Action indicates that it is not clear which "set" is being referred to in the phrase "communicating the set to the client". Applicant respectfully disagrees. As indicated above regarding claims 1, 15, 31 and 45, the phrase "the set" is used consistently throughout the claims and has proper antecedent basis in "a set", and lack of clarity does not arise because the claims recite the phrase for the first time using "the set". Additionally, two different sets are not recited in the same claims, thus uncertainty should not exist as to which of two sets was intended. Moreover, the phrase "the one or more structured answer data objects" is already being used as a term independent from "the set". Thus, Applicant respectfully submits that a person of ordinary skill could reasonably ascertain that "[t]he set" is based on, and yet distinct from, "the one or more structured answer objects"; "the set" also being based on "term(s) and/or phrase(s) related to the product problem description".

Withdrawal of the objections to claims 4, 18, 34 and 48 is respectfully requested.

In addressing **claims 6, 20 and 36** the Action indicates that "identifying" is interpreted to refer to "the step of identifying" as recited in the respective base claims. Applicant agrees with this clear interpretation of the term. Even in view

of this correct interpretation, claims of 6, 20, and 36 have been amended to more particularly point out that "identifying" has antecedent in their respective base claims. Withdrawal of the objections to claims 6, 20 and 36 is respectfully requested.

In addressing **claims 7, 21 and 37**, the Action indicates that "wherein providing, if there is more [...]" is interpreted to refer to "the step of providing" as recited in the respective base claims. Applicant agrees with this interpretation of the term. Even in view of this correct interpretation, Applicant has amended claims of 7, 21 and 37 to more particularly point out that the "wherein providing the set, if there is more [...]" has appropriate antecedent basis the respective base claims.

Withdrawal of the objections to claims 7, 21 and 37 is respectfully requested.

**Claims 10, 24, 40 and 51** have been amended to more particularly point out that "the historic problem diagnosis data comprise any one or more of hierarchically structured product problem description(s), symptom(s), cause(s), and resolution(s)".

In view of the above, withdrawal of the objections to claims 10, 24, 40 and 51 is respectfully requested.

**35 USC §112, Second Paragraph, Rejections**

Claims 2-8, 10-14, 16-22, 24-28, 30, 32-38, 40-44, 46-49 and 51-54 stand rejected under 35 USC §112, second paragraph, as being indefinite. The preambles of these rejected claims have been amended to more particularly show antecedent basis on their respective base and/or intervening claims.

Regarding **claims 7, 21 and 37**, the Action indicates that the word "if" renders the claims indefinite because it is unclear whether the limitations following the word are part of the claimed invention. Applicant disagrees. Exemplary claim 7 as filed recites "if there is more than one structured answer object in the set, the set comprises a reinforced cluster of structured answer objects". Applicant respectfully submits that a person of ordinary skill in the art would reasonably ascertain that the claimed "set" would necessarily comprise "a reinforced cluster of structured answer objects" when the set included more than a single structured answer object. Thus, use of the word "if" in these claims does not render the remainder of the claim indefinite. However, to expedite allowance of this application claims 7, 21 and 37 have been amended to more clearly show that "the set comprises a reinforced cluster of structured answer objects." This amendment does not substantially change the scope of the claims as filed, because a person of ordinary skill would reasonably ascertain from the claims as filed, that a set comprising **objects** would necessarily comprise more than a single object. Withdrawal of the 35 USC §112, second paragraph rejection of claim 7, 21 and 37 is requested.

**Claims 41-44** have been amended so that their respective preambles properly depend from the "computing device" of their respective base claim and

any intervening claims. Withdrawal of the 35 USC §112 second paragraph rejection of claims 41-44 is respectfully requested.

**Claims 52-54** have been amended so that their respective preambles properly depend from the "computing device" of their respective base claim and any intervening claims. Withdrawal of the 35 USC §112 second paragraph rejection of claims 52-54 is respectfully requested.

### **35 USC §101 Rejections**

Claims 9-14, 23-18, 39-44 and 50-54 stand rejected under 35 USC §101 as being directed to non-statutory subject matter.

Referring to **claims 9, 23, 39 and 50**, the Action indicates that the claimed features do not require that the information be presented to a user or other application. Applicant has amended these claims to illustrate that the information is presented "to a user". This is described in the specification, for example, at paragraph [0008] and in reference to the description associated with Fig. 2.

The preambles of **claims 15-30, 41-44 and 52-54** have been amended to indicate that the claims are directed to "tangible computer-readable medium".

Withdrawal of the 35 USC §101 rejections is respectfully requested.

### **35 USC §102 Rejections**

Claims 1-54 stand rejected under 35 USC §102(e) as being anticipated by US patent serial number 6,711,585 to Copperman et al ("*Copperman*"). However, the Manual of Patent Examining Procedure (M.P.E.P.) states that a claim is anticipated by a reference **only** if each and every element as set forth in the claim

can be found in the reference and, furthermore, that the **identical** invention **must** be shown in as complete detail as is contained in the claim.

A claim is anticipated **only** if each and every element set forth in the claim is found, either expressly or inherently described, in a single prior art reference. ... The **identical** invention **must** be shown in as **complete detail** as is contained in the ... claim.

(M.P.E.P. § 2131, subsection titled “TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH EVERY ELEMENT OF THE CLAIM”, emphasis added). Each of the independent **claims 1, 9, 15, 23, 29, 31, 39, 45 and 50** include at least one feature not described by *Copperman*. For at least this reason, the rejections under 35 U.S.C. § 102 of the independent claims 1, 9, 15, 23, 29, 31, 39, 45 and 50 should be withdrawn. Examples of claim features not found in *Copperman* are given below, beginning with claim 31 (this is the first claim addressed by the Action under this rejection).

Amended **independent claim 31** recites:

- converting, by a computing device, unstructured service requests to one or more structured answer objects, each unstructured service request including information to narrow product problem symptom(s) to a root cause, each structured answer object comprising hierarchically structured historic problem diagnosis data; and
- in view of the product problem symptom(s):
  - identifying a set of the one or more structured answer data objects, each structured answer data object in the set comprising term(s) and/or phrase(s) related to the product problem symptom(s); and
  - providing historic and hierarchically structured problem diagnosis data from the set to an end-user for product problem diagnosis.



The Action addresses the first clause of these claimed features by concluding that they are anticipated by *Copperman's* description of Fig. 1 at paragraphs 10 and 11. Although this is prima facie false since *Copperman* does not describe "converting unstructured service requests [into] object[s] comprising hierarchically structured historic problem diagnosis data", claim 31 has been amended to show that each of the "unstructured service requests [...] include[es] information to narrow product problem symptom(s) to a root cause". This is described in the specification at [0026]. This does not substantially change the scope of this claim since the amended "problem description" includes the symptoms as described, for example, at paragraph [0026].

To place *Copperman's* description of Fig. 1 and paragraphs 10 and 11 into context, *Copperman* at col. 2, lines 13-42, is first discussed. This portion describes (emphasis added):

*Documents stored in the organization and retrieval subsystem may be manually through an attribute matching process or automatically classified into a predetermined number of taxonomies through a process called autocontextualization. In operation, the documents are first transformed from clear text into a structured record (knowledge container) automatically constructed indexes (tags) to help identify when the structured record is an appropriate response to a particular query. An automatic term extractor creates a list of terms that are indicative of the subject matter contained in the documents, and then a subject matter expert identifies the terms that are relevant to the taxonomies. A term analysis system assigns the relevant terms to one or more taxonomies, and a suitable algorithm is then used to determine the relatedness (weight) between each list of terms and its associated taxonomy. The system then clusters documents for each taxonomy in accordance with the weights assigned to the terms in the taxonomy's list and a directed acyclic graph (DAG) structure is created.*

*The present invention may then be used to aid a researcher or user in quickly identifying relevant documents, in response to an*

*inputted query. It may be appreciated that both a document's content and information added during autocontextualization is available for retrieval in the present invention. Moreover, the present system can retrieve any type of knowledge container, including not only those derived from some kind of document (such as "document" or "question" knowledge containers) but also those that represent people and resources (such as knowledge consumer and product knowledge containers.)*

In view of the above explicit description, *Copperman* creates structured records (knowledge containers) from text documents such as question and answer documents and those representing product knowledge. *Copperman* referring to TABLE 1 at column 5, lines 46-53, describes that **questions** in one structured record maintain links (pointers) to corresponding **answers** in another structured record (and vice versa). Col. 6, lines 24-29, of *Copperman* provides examples of product knowledge-based structured containers. Specifically, *Copperman* describes the product knowledge includes **product feature descriptions** and product **marketing information** such as a "catalog entry that describes the product and text, includes a picture or banner ad for the product, etc." Accordingly, *Copperman* can fairly be indicated to describe creating structured records from text documents, where the structured records include questions linked to answers (and vice versa), product feature descriptions, and product marketing information. Moreover, responsive to receiving a natural language input query, *Copperman* identifies documents relevant to the input query from taxonomy-based clusters of the structured records. *Copperman* at col. 30, line 66, through col. 31, line 22, teaches that such queries contain "zero or more initial **taxonomy tags**; zero or more **taxonomic restrictions**; and knowledge **container**

**restrictions**". Clearly, *Copperman's* does not describe a query that includes "a product problem description" as the "search query" of this claim requires.

For purposes of evaluating the features of claim 31, it is quite clear that the above description of *Copperman* is completely silent with respect to any description that document text (including text that is directed to questions and answers, or product feature and marketing information) are "unstructured service requests", where "each unstructured service request including information to narrow product problem symptom(s) to a root cause", as the claim requires. Thus, the above recited portion of *Copperman* does not describe "converting unstructured service requests to" anything, and especially not into "unstructured service requests to one or more structured answer objects [that comprise] hierarchically structured historic problem diagnosis data" as the claim requires. Moreover, rather than creating structured objects (i.e., knowledge containers from "unstructured service requests", *Copperman's* product knowledge containers are likely generated from carefully structured data. For instance, professional writers or vendors are typically tasked with documenting product features, and creating advertisements for catalogs to market products. As a result, such product knowledge containers are not generated from "unstructured service requests", and they are also likely not generated from "unstructured" data, in general.

Referring to the cited portions of *Copperman* at Fig. 1 and corresponding description at paragraphs 10 and 11, these portions show and describe relationships between the above described knowledge containers (please also see column 3, lines 14-15). Rather than describing the identical invention of claim 31 in as complete detail as shown in claim 31, *Copperman* clearly describes that knowledge containers are created by accumulating and processing representative

documents. As described in the preceding two paragraphs, *Copperman* describes that knowledge containers may include answers linked to specific questions and product feature and marketing/advertising descriptions (please see col. 5, lines 23, 33-35, 48-49, and 52-53, and col. 6, lines 24-29). For the reasons already presented, encapsulating linked answer/question pairs and product marketing materials into a structured record (knowledge container) clearly does not describe or fairly suggest “converting unstructured service requests to [...] object[s] comprising hierarchically structured historic problem diagnosis data”, as the claim requires.

Amended **independent claim 31** also recites “in view of a product problem symptom(s): “identifying a set of the one or more structured answer data objects, each structured answer data object in the set comprising term(s) and/or phrase(s) related to the product problem symptom(s)”. The Action asserts that these features are described by *Copperman* with respect to Fig. 2 and paragraph 12. Applicant respectfully disagrees.

Fig. 2 shows that knowledge containers include five main components (column 3, lines 16-17). As indicated by the Action, these components include administrative metadata, taxonomy tags, marked content, original content, and links. As clearly shown by Fig. 2, such **administrative meta-data 50** provides a document author name, document creation date, and expiration date. **Taxonomy tag 60** examples include tax audit, tax invasion and fraud tags. **Marked content 70** examples show paragraph <P>, organization <org>, person <person>, and term <term> content markup. Clearly, these explicit teachings of *Copperman* do not describe, or fairly suggest, identifying anything related to “product problem symptom(s)”. Additionally, for the reasons already presented above, description

associated with Table 1 does not do anything to cure the already described descriptions deficiencies of *Copperman*. Thus, *Copperman* cannot anticipate “in view of a product problem symptom(s): “identifying a set of the one or more structured answer data objects, each structured answer data object in the set comprising term(s) and/or phrase(s) related to the product problem symptom(s)”, as the claim requires.

**Independent claim 31** further recites “providing historic and hierarchically structured problem diagnosis data from the set to an end-user for product problem diagnosis.” The Action asserts that this is taught by *Copperman* at col. 7, lines 35-43. Applicant disagrees. These cited portions of *Copperman* plainly describe that a structured record in the form of a knowledge container can be displayed to a user in a complete and original form, such containers include relationship-based links to other related containers (e.g., a question container linked to an answer container). Applicant respectfully submits that presenting a structured question record to a user, where the presented record is linked to a structured answer record does not describe, or fairly suggest, “providing historic and hierarchically structured problem diagnosis data from the set to an end-user for product problem diagnosis”. This is especially true when “the set” was generated from “the one or more structured answer objects”, which in turn were generated from “unstructured service requests”, as the claim requires.

Since a single reference must show the identical invention in as complete detail as is contained in a claim to anticipate the claim, *Copperman* does not anticipate claim 31 at least for each of the reasons discussed above. Withdrawal of the 35 USC §102(e) rejection of claim 31 is respectfully requested.

Amended **independent claims 1, 15, 31 and 45** include at least a subset of the features described above with respect to claim 31 as not being anticipated by *Copperman*. For the reasons already discussed with respect to claim 31, *Copperman* does not anticipate independent claims 1, 15 and 45. Withdrawal of the 35 USC §102(b) rejection of these independent claims is respectfully requested.

**Claims 2-8, 16-22, 32-38 and 46-49** depend from respective ones of allowable independent claims 1, 15, 31, and 45. Thus these dependent claims are not anticipated by *Copperman* at least for reasons based on their respective dependencies. Withdrawal of the 35 USC §102(b) rejection of these dependent claims is respectfully requested.

In addressing amended **independent claim 39**, the Action suggests that Copperman's description that "[t]he present invention may then be used to aid a researcher or user in quickly identifying relevant documents, in response to an input query" describes "communicating [...] a search request to a server computing device, the search request comprising a product problem description", as claim 39 requires. Although, this is prima facie false since this cited portion (and *Copperman* as a whole) does not describe "the search request comprising a product problem description" as the claim requires, claim 39 has been amended to show that "a troubleshooting wizard" communicates the "search request". As claimed, "the troubleshooting wizard allows a user to systematically present and leverage hierarchically structured historical product problem diagnosis data from structured answer data objects in view of a product problem description". This is supported by the specification at paragraph [0036].

Instead of describing the above claimed features, *Copperman* describes that "[s]ummary views are typically used when displaying a list of possible knowledge containers in order to guide the user's selection of a particular knowledge container". Clearly, an application presenting such a summary view to user does not describe, or fairly suggest, "the troubleshooting wizard [that] allows a user to systematically present and leverage hierarchically structured historical product problem diagnosis data from structured answer data objects in view of a product problem description", as required by claim 39.

Additionally, claim 39 requires "the search request comprising the product problem description". As indicated above with respect to claim 31, *Copperman* does not describe this recited feature. Instead, when *Copperman* describes the "particular query", *Copperman* teaches that the query contains "zero or more initial **taxonomy tags**; zero or more **taxonomic restrictions**; and knowledge **container restrictions**". Clearly, *Copperman's* does not describe a query that includes "a product problem description" as the "search query" of this claim requires.

Moreover, claim 39 requires "responsive to receiving a response to the search request, presenting, by the **troubleshooting wizard**, information from the response to the user; and wherein the information comprises the **hierarchically structured historic problem diagnosis data**, the historic problem diagnosis data being associated with term(s) and/or phrase(s) **related to the product problem description**." For purposes of examining these claimed features, the Applicant respectfully submits that the invention of *Copperman* sends an input query (i.e., a query containing zero or more initial taxonomy tags; zero or more taxonomic restrictions; and knowledge container restrictions) to a search engine. The search

engine evaluates indexes to identify and rank a set of knowledge container lists, whereupon "**a ranked list of knowledge containers** is presented to the user" (emphasis added). (Please see *Copperman* at col. 31, lines 23-41, and col. 36, lines 18-64). These teachings are consistent with *Copperman's* indication that "the present invention may then be used to a researcher or user in quickly identifying relevant documents, in response to an input query". Clearly, however, these teachings do not describe a "presenting, by the troubleshooting wizard, [...] the hierarchically structured historic problem diagnosis data [...] related to the product problem description", as claim 39 requires.

For each of the above reasons, *Copperman* does not teach each and every element of claim 39. Since a single reference must show the identical invention in as complete detail as is contained in a claim to anticipate the claim, *Copperman* does not anticipate claim 39. Amended **independent claims 9, 23 and 50** include at least a subset of the features described above with respect to claim 39 as not being anticipated by *Copperman*. For the reasons already discussed with respect to claim 39, *Copperman* also does not anticipate independent claims 9, 23 and 50.

Withdrawal of the 35 USC §102(b) rejection of independent claims 9, 23, 39 and 50 is respectfully requested.

**Claims 10-14, 24-28, 40-44 and 51-54** depend from respective ones of allowable independent claims 9, 23, 39 and 50. Thus these dependent claims are not anticipated by *Copperman* at least for reasons based on their respective dependencies. Withdrawal of the 35 USC §102(b) rejection of these dependent claims is respectfully requested.

Amended **independent claim 29** recites:



- a product problem description data field;
- a product problem cause data field;
- a product problem resolution data field; and
- wherein the product problem description data field is a parent node of the product problem cause data field, and the product problem cause data field is a parent node of the product problem resolution data field.

In addressing these features, the Action asserts that they are described by *Copperman's* at col. 30, line 66 through col. 31, line 7, col. 7, lines 35-43, and Fig. 2. Applicant disagrees.

*Copperman's* at col. 30, line 66 through col. 31, line 7, describes that in natural language inquiry-based retrieval, a user can specify initial taxonomy tags, taxonomic restrictions and knowledge container restrictions. *Copperman* at col. 30, line 66, through col. 31, line 22, specifically teaches that such queries contain “zero or more initial **taxonomy tags**; zero or more **taxonomic restrictions**; and knowledge **container restrictions**”. Clearly, nowhere do these teaching describe or fairly suggest “a **product problem cause data field**”, “a **product problem resolution data field**”, and corresponding **hierarchical structure** such that “wherein the product problem description data field is a **parent node of the product problem cause data field**, and the product problem cause data field is a **parent node of the product problem resolution data field**”, as claim 29 requires.

*Copperman* at col. 7, lines 35-43, teaches that a knowledge container can be displayed to a user in a complete and original form, such containers include relationship-based links to other related containers (e.g., a question container

linked to an answer container). Although the cited portion fairly describes displaying a structured question record to a user, where the question record is linked to a structured answer record, the cited portion does not describe each and every element of claim 29. For instance, nowhere does the cited portion, or *Copperman* as a whole describe, or fairly suggest, “a product problem **cause** data field”, “a product problem **resolution** data field”, and corresponding **hierarchical structure** such that “wherein the product problem description data field is a parent node of the product problem cause data field, and the product problem cause data field is a parent node of the product problem resolution data field”, as claim 29 requires.

The Action relies on Fig. 2 asserting that the claimed "description" could be the knowledge container's cluster, the claimed "cause" could be a "Taxonomy Tag" or "Marked Content" and the claimed "resolution" could be a "Link" to another knowledge container. *Copperman* clearly describes that the knowledge container comprises description of one type or another. However, *Copperman* is completely silent on a knowledge container that comprises “a product problem description” as the claim requires.

The Action's assertion that the claimed "cause" could be a taxonomy tag or marked content is clearly not described or necessarily present in *Copperman*. *Copperman* at column 9, lines 23-24, describes that there are **three types of taxonomies** "topic taxonomies, filter taxonomies and lexical or mentioned taxonomies." "[T]opic taxonomies represent areas where the expert has expertise[, or] people's interests" (col. 9, lines 33-37). "Filter taxonomies represent meta-data about documents, questions, knowledge-providers or knowledge-consumers that typically is not derivable solely from the textual content of the knowledge

container” (col. 9, lines 38-41). “Lexical taxonomies are useful for identifying and grouping concepts that occur using specific words and phrases within specific knowledge containers” (col. 10, lines 20-22). “Marked content 70 is a textual representation of the contents of the knowledge container or a description or representation of the resource” (col. 6, lines 63-65). Clearly, these descriptions regarding taxonomies and marked content do not describe “a product problem cause data field” as claim 29 requires.

Moreover, the Actions assertion that the “resolution” could be a “link” to another container is unsupportable, especially since *Copperman* describes links as pointers, and nowhere does *Copperman* describes that a link between containers is a “product problem resolution data field” as the claim requires. Rather, *Copperman* explicitly describes that Fig. 6 shows “knowledge containers 20a-c with their associated links 90a-c. As shown in FIG. 6, link 20a **points** to knowledge container 20 b, link 90b **points** to knowledge containers 20a and 20c, and link 90c **points** to knowledge container 20b.” (Emphasis added). Thus, *Copperman* clearly uses “links” between containers to **point** from one container to another container. This linked relationship does not describe or fairly suggest a “product problem resolution data field” as claim 29 requires.

For each of the above reasons, *Copperman* does not teach each and every element of claim 29. Since a single reference must show the identical invention in as complete detail as is contained in a claim to anticipate the claim, *Copperman* cannot anticipate claim 29. Withdrawal of the 35 USC §102(e) rejection of claim 29 is respectfully requested.

**Dependent claim 30** depends from independent claim 29 and is not anticipated by Copperman at least for reasons based on this dependency. Withdrawal of the 35 USC §102(e) rejection of claim 30 is respectfully requested.

**Conclusion**

The present application is considered in good and proper form for allowance, and the Examiner is respectfully requested to pass the application to issue. If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of the application, the Examiner is invited to call the undersigned attorney.

Respectfully Submitted,

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